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August 24, 2020

Meredith Montgomery Clerk of the Appellate Courts 303 K Street Anchorage, AK 99501

Re: State v. Graham, S-17411

Dear Ms. Montgomery,

Pursuant to Alaska Appellate Rule 212(c)(12), Stacey Graham provides the following supplemental authority relevant to pages 44 - 50 of the petitioner's brief and pages 46 - 48 of the respondent's brief:

*Krechman v. County of Riverside,* 723 F.3d 1104, 1112 (9th Cir. 2013); *United States v. Wolf Child,* 699 F.3d 1082, 1102-03 (9th Cir. 2012); *United States v. Arnett,* 628 F.2d 1162, 1165-66 (9th Cir. 1979).

Sincerely,

/s/ Renee McFarland

Renee McFarland Deputy Public Defender

cc: Nancy Simel, Office of Criminal Appeals